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June 2, 2022

**VIA ECF**

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Schansman et al. v. Sberbank of Russia PJSC et al., Case No. 19-cv-2985-ALC-GWG; VTB Bank PJSC's Letter Requesting Extension of Time for New Counsel to File Notice of Appearance

Dear Judge Gorenstein:

On behalf of Defendant VTB Bank (PJSC) ("VTB"), we write with respect to the deadline for VTB's new counsel to enter its appearance. On May 2, 2022, the Court entered an order setting today, June 2, 2022, as the deadline for VTB's new counsel to enter its appearance on the docket, (Dkt. No. 333). Since that time, VTB has been searching for counsel to represent it in this litigation, and has recently come to an agreement-in-principle with Marc Agnifilio and Zach Intrater of Brafman & Associates P.C. to undertake this representation. Due to the current Russia-related sanctions regime in the United States, the logistics of finalizing the engagement are taking longer than anticipated, but VTB anticipates this process to be concluded shortly. Accordingly, VTB respectfully requests a two-week extension until Wednesday, June 15, 2022, for new counsel to file their notices of appearance in this lawsuit. This is VTB's first request for an extension.

Plaintiffs have not consented to the requested extension of time.

Sincerely,

/s/ Christopher R. Harris

Christopher R. Harris

cc: All Counsel of Record (via ECF)